1	have come up?
2	MS. SCHMELTZER: Well, I'll be glad to break
3	it down.
4	MS. ABRUTYN: That would be great.
5	BY MS. SCHMELTZER:
6	Q Did you have any discussions
7	A I don't recall, but if Emily had asked me
8	anything about the notes for clarification I would have
9	answered her. Specifically I do not remember
10	conversations that we're talking about a couple of
11	years later. I cannot recall that. But I can tell you
12	had Emily asked me anything I would have answered her.
13	If she needed clarification I would have given it to
14	her.
15	Q On a particular point?
16	A On any point she would have asked.
17	Q But you would recall if you had had a meeting
18	at the station with Ms. Barr to discuss the notes,
19	wouldn't you?
20	A I do not recall having a meeting at the
21	station with Ms. Barr to discuss the notes.
22	Q Or with anyone else at the station to discuss
23	the notes?
24	A I do not recall having any meeting with
25	anyone else at the station to discuss the notes.

Did you ever discuss with Ms. Barr what 1 Ms. Zeiden's notes or recollection might indicate? A 3 No. 4 0 Did you ever discuss with Ms. Barr what 5 Ms. Velleggia's calendar or notes might indicate? There wouldn't be no reason for me to. 6 Α No. 7 So if you had any discussions with Ms. Barr it was just about some aspect of your notes? 8 9 Α If she had any point of clarification it 10 would have been about mine. It would not have been about anyone else's. 11 12 I think it would be helpful -- you have the 13 original notes? By that way, Ms. Covington, we've been 14 going for about an hour and if you would like to take a break at any time I'll be happy to do that. 15 16 Α No, I'm fine. Thank you. 17 And, you know, if at any time you want to take a break to use the facilities or anything just let 18 19 me know. Similarly --20 Α If I have any more coffee I might. 21 You know, if you don't understand one of my 22 questions please feel free to tell me. Now, I'd like to show you, I'd like to show you, Ms. Covington, a 23 copy of some notes and I'd like to ask you if these are 24 25 your original notes and we're going to have to share FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area (301) 261-1902
Balt. & Annap. (410) 974-0947

these across the table because there are some things 2 that you can only read in the original. Α These are my notes. 4 Q Those are your notes that you made after 5 Emily requested you to make them? Α 6 Um-hum. These are my notes. 7 MS. ABRUTYN: Objection. She didn't say Emily requested her to make the notes. She said --8 9 BY MS. SCHMELTZER: 10 Q After Emily requested your calendar? 11 Α These marks are not mine, the pen. 12 Do you know whose marks those are? Q 13 Α No, but I know the pen's not mine. I assume 14 it's from somebody who went through and picked out from 15 them but they're not mine, but these are -- this is --16 these are mine. 17 Now --Q 18 A You want them back? 19 Yes. Let me just ask you, the notes begin on 0 20 September 3rd and there are five pages of notes which 21 go from September 3rd through September 28th. Then the 22 notes begin again on June 3rd and are labeled again, so 23 it's 1, 2, 3. There are four pages of notes that go 24 from June 3rd through August 23rd. Can you tell me did 25 you begin with September? That's my question.

1	A Well now, I don't know. It looks like that
2	if it's that one. Well, but here now, this also has 2,
3	3, 4. It looks like I might have they're clipped
4	together in this folder, but it looks like I might have
5	done it this. Then I started over, over again
6	because I got 1, 2, 3 and 4 and then I have 1, 2, 3 and
7	4 again, so it could have been either way. Then it
8	just starts again with 1, but I also have 2, 3 and 4
9	here.
10	Q Well, do you recall when you
11	A No, I don't.
12	Q You have no recollection of whether you
13	looked at one period of time first?
14	A No.
15	MS. ABRUTYN: Can we just get into the record
16	that there's been no representation anywhere that the
17	order the notes are in now has any relation to any
18	order they were ever in before they were ever given to
19	Emily?
20	MS. SCHMELTZER: Well, let me give them back
21	to the witness.
22	BY MS. SCHMELTZER:
23	Q Ms. Barr, if you
24	A I am Ms. Covington.
25	Q I mean Ms. Covington. I'm sorry.

- A What is your name?

 O Ms. Schmeltzer.
- 3 A Ms. Schmeltzer, okay.
- Q Ms. Covington, if you would look at the first page that says Emily there.
- 6 A Um-hum.
- 7 Q Did you write that?
- 8 A All this is my writing.
- 9 Q All that's your writing?
- 10 A Um-hum.
- 11 Q So Emily is your writing?
- 12 A Um-hum.
- Q Okay. Now -- you'll get them back in a second. If you look at the top of the page -- now this
- 15 would be at page 1 again because the next page is page
- 16 2. If you would look at the top of the page,
- 17 Ms. Covington, and there's some language that has been
- 18 stricken -- that, I'm sorry, has been erased. It looks
- 19 like what it said was, "Emily, what is not here but
- 20 something I include, " and I'd like to ask you if you
- 21 recall writing something that was erased there?
- 22 A Well, I tell you, I write -- a lot of things
- 23 I erase myself. That's why I always write in, you
- 24 know, pencil. Obviously there's an erasure here.
- 25 O Do you recognize your writing under the

1	erasure?
2	A Yeah.
3	Q Do you know what you had written there? Do
4	you recall?
5	A Something I obviously erased, but I don't, I
6	don't know what it is. I can't read it.
7	Q You can't recall whether you wanted to
8	include something?
9	A I might have. As I say, that's why I always
10	write in, in pencil because I am write and erase a
11	lot.
12	Q Now, let me also ask you this. The notes
13	from June 3rd to August 23rd are less complete than the
14	notes for September.
15	MS. ABRUTYN: Objection. That's a
16	characterization of the documents.
17	MS. SCHMELTZER: Well, I'll let the witness
18	look at the document.
19	BY MS. SCHMELTZER:
20	Q And I'd like to ask you if you made any
21	change in your calendar in September to add additional
22	information, and feel free to look through there?
23	A Now, I don't understand your question.
24	Q Well, if you'll look through June 3rd through
25	August 23rd your notes are rather sketchy.
	FREE STATE REPORTING, INC.

- 1 Α Yeah. 2 Q If you look at, at the notes for September 3 they're more detailed. 4 A Well, some of --5 My question is can you explain the 0 difference? 6 7 Well, it could have been after I'd written --I sometimes rewrite stuff. This is squeezed in here. 9 Some of it is not necessarily the most detailed but it, you know, takes up the space. I could -- you know, I 10 11 used to write editorials in longhand. If they had too messy pages then I'd pull it all out and rewrite it 12 13 again, so I can't answer your question beyond that. 14 Q Do you know whether your calendar became more detailed in September? 15 I, I don't know but I doubt if it did. I was 16 17 trying to see what the questions were involved but, no, I can't explain that. 18 19 When you provided your notes to Ms. Barr did 20 you make a copy of them? No. I don't have a photocopying machine. I 21 Α 22 don't have any stuff at home. Do you -- did Ms. Barr make a copy of the 23 Q
 - notes for you?

24

25

Not that -- I had no use for the notes. A

Q Were you contacted by Ms. Barr requesting your calendar after you provided her with the notes?

A Sometime after that she asked me again for the calendar.

- Q Do you recall when that was?
- A No, I don't recall specifically.

1

2

3

4

5

6

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

7 Q And did you have the calendar at that point 8 in time?

I thought I did. I looked around. Α It wasn't in the file and I couldn't find it in the piles and I looked, you know, I looked through everything and what I assume is that it got thrown out because I was -- in that same period I was going through a lot of the boxes and things and tossing stuff and having piles of things on the cedar chest or the bed and -- or in a, you know, toss box trying to decide what to keep and cleaning them out, and I looked, I looked high and low for it and it was -- and it's embarrassing when you're that messy and you can't find something like that but I looked every place and I couldn't find it, so I can only assume it got thrown down the trash chute with some of the, you know, other stacks of papers and files that got thrown out because I didn't put it right back after I'd used it obviously.

Q When you gave Ms. Barr the notes did she give

- 1 you any instructions concerning retaining your
 2 calendar?
- A No. I assume she thought I would.
- 4 Q Did she call you at any point in the summer
- 5 of 1992 to request your calendar?
- 6 MS. ABRUTYN: Objection. She just said she
- 7 doesn't call when she asked for the calendar.
- 8 WITNESS: I don't know when. She called me
- 9 again after I'd given her the notes and after some
- 10 other time and wanted the calendar and that's when I
- 11 started to look for the calendar.
- BY MS. SCHMELTZER:
- 13 Q You don't recall when, when that was in --
- 14 A No, I don't, no.
- Q Well, my question is in relation to when you
- 16 prepared the notes do you recall when Ms. Covington
- 17 (sic) called you to request the calendar?
- 18 A Ms. Schmeltzer, my name is --
- 19 Q Ms. Barr called you, when Ms. Barr called you
- 20 to request the calendar?
- 21 A No. I don't recall that.
- Q Well, do you recall whether it was six months
- 23 later or a year later?
- 24 A I don't recall and if I'm -- I don't think
- 25 I'm supposed to speculate.

1	Q No. We don't want you to do that.
2	A Yeah. Then I
3	Q Did she call you more than once to request
4	the calendar?
5	A She may have asked me the second time if I'd
6	found she may have called again to see if I'd found
7	it because obviously when I looked through everything
8	the first time and couldn't find it she may have called
9	again to ask if I had found it, but I didn't and I, you
10	know, I looked and I can only assume it just got tossed
11	with some of the other papers that were I was going
12	through. It was 43 years of stuff.
13	Q Now, I take it in your calendar you had a
14	meeting, you had the name of a person and you might
15	have the subject. Did you ever put down what
16	programming resulted from that contact?
17	A No.
18	Q Did you ever have any conversations with
19	Ms. Barr about what programming resulted from a
20	particular contact?
21	MR. HOWARD: Objection.
22	MS. SCHMELTZER: On what basis?
23	MR. HOWARD: On time. Specify a time period.
24	BY MS. SCHMELTZER:
25	Q In the summer of 1992 did you have any

1 conversations with Ms. Barr about what programming 2 might have resulted from a particular contact?

- A You mean after I gave her the notes?
- O Either before or after.

- A Well, I would -- in the summer of '92 I didn't work for the television station, so I would not ask her what programming came out of the notes I had given her for, you know, for my previous summer. I mean, some things would have happened from what was in that calendar and the information that I shared with Arnie and Emily and the news desk. The programming probably well would have been before I left the station or early in the next year, not after she got the notes in '92.
- Q Well, let me clarify that a little bit.

 After you gave Ms. Barr the notes did you and she have any discussions as to which programs that WMAR had aired in 1991 might have -- that might have been in response to a particular contact you had?
- A No. No, but I would think in the records that you had, you know, reports there might be, you know, some indication, but I did not -- I didn't, I didn't ask her then -- discuss that with her then.
- Q Did Ms. Barr discuss with you in the summer 25 of 1992 what programming WMAR-TV might have aired in

1991 in response to specific issues --2 Α No. --- like redistricting or the Supreme Court 3 4 or some other community issue? 5 No. Ms. Barr really didn't discuss the station's programming with me after I left the station 6 unless it might be something in which I was involved, 8 you know, from ongoing community stuff, but there would 9 be no reason for her and it would, and it would be at 10 that point truly almost none of my business. 11 Let me ask you about something on the notes. 12 On August 1 it says AFRAM luncheon and then (Pgm.), 13 which I take it means program, in promotion file. You 14 want to look at that? 15 Α Um-hum. 16 Now, my question is I take it the -- in your calendar the calendar would have reflected that there 17 18 was an AFRAM luncheon on August 1? Is that correct? 19 A Yeah. 20 Would your calendar have reflected that there 21 was a program in the promotion file or is that 22 something you added? 23 That's probably something I added. A 24 Why did you add that? 0 25 Well, if you wanted more information on AFRAM A

1 and because we were, you know, a sponsor of that 2 luncheon there was a program of that luncheon I knew in 3 the promotion file because I gave a couple programs to 4 the Promotion Department, so that was just I guess a --5 if you want anymore information there's a program in 6 the promotion file. So that was kind of a quide for Emily Barr to 7 8 use to help put her exhibit together? Is that what --9 It was just information I had. Whether she 10 wanted to use it or not would obviously be her 11 determination, but I just -- you know, if I knew something like that and it would be helpful and she'd 12 13 ask I just jotted it down. MR. DZIEDZIC: Could you clarify for the 14 15 record what she means by program in that context? WITNESS: Each -- at the AFRAM luncheon there 16 17 were profiles of each year. The AFRAM only sponsored 18 it for a number of years and we do on air profiles that 19 the station did. They might honor educators. might honor sports figures. They might honor 20 entertainment. And there was -- the theme was in there 21 22 and also some information about AFRAM and the committee -- community people who were working and it's a formal 23

FREE STATE REPORTING, INC.
Court Reporting Depositions
D.C. Area (301) 261-1902
Balt. & Annap. (410) 974-0947

tended to be a bigger program than some luncheons you

-- you know, when you go to a luncheon and there's

24

25

1	have.
2	MR. DZIEDZIC: You're not referring to a
3	program that was broadcast over the air?
4	WITNESS: No. I'm referring to
5	MR. DZIEDZIC: That was what
6	WITNESS: Yeah, a luncheon program. Yeah, a
7	luncheon program. No. The programming is profiles of
8	members of the African, you know, American community
9	that were being honored.
10	MR. DZIEDZIC: But that's separate from
11	WITNESS: That's separate. That would be
12	they would be news profiles and we may have been at
13	public affairs.
14	MR. DZIEDZIC: But that's not
15	WITNESS: The program I'm talking about is
16	the physical program you get when you go to an event,
17	you know, like a basketball game has a program.
18	MR. DZIEDZIC: Yeah. Thank you.
19	BY MS. SCHMELTZER:
20	Q Did Emily give you any guidelines on what she
21	would like to see in your notes?
22	A She said that she it was for the for
23	ascertainment, you know, and so
24	Q Well, what did she say with respect to
25	ascertainment?

1	A well, she said the contacts that I had, the
2	people with whom I had met, and I know that and, you
3	know, so what you do in ascertainment is you discuss
4	community issues and you get perspective or you, if
5	you're in a meeting, you get organization and where
6	people are coming from. It wasn't necessary really for
7	her to explain that to me. I you know, and I kind
8	of knew what she would want.
9	Q Were you the only one at the station who
10	attended the AFRAM luncheon or were there other people
11	who attended that luncheon?
12	A We had a table at the AFRAM luncheon.
13	Q You bought a table for the luncheon?
14	A The station did. The station sponsored it
15	and two of the station on-the-air people emceed the
16	luncheon.
17	Q Right. And was it your idea that that was a
18	community ascertainment or did Emily
19	A That was just what was on my calendar and I
20	gave her the information that was on my calendar.
21	Q So when you say Emily asked you for
22	ascertainment
23	A I gave her
24	Q you gave her
25	A If I had given her the calendar she would
	FREE STATE REPORTING, INC. Court Reporting Depositions

1	have had all the dates on the calendar. I gave her all
2	the dates on the calendar on those pieces of paper.
3	Q So you gave her information that might not
4	that you might not necessarily consider ascertainment?
5	Is that what you're saying?
6	A Well
7	MR. HOWARD: That's not what she testified.
8	WITNESS: No. And I think if you've ever
9	been to any of these kinds of luncheons and were there
10	early it's you really talk to a lot of people, not
11	you just don't sit and watch the program and it was
12	the practice to get there early so that you talked to
13	educators, you talked to community leaders, and you
14	have to remember I had a lot of contacts, so that the
15	advantage of going to the luncheon was not a free
16	lunch.
17	BY MS. SCHMELTZER:
18	Q Well, my question is
19	A My advantage of going there was to be able to
20	interface with people and find out where they were
21	coming from.
22	Q So you did consider the AFRAM luncheon as a
23	community ascertainment or as an ascertainment?
24	A When I put it down there I considered it as
25	one of the items on the calendar and I was asked for

everything on my calendar. But did I ascertain there and the things like that, yes.

3

4

5

6

7

8

9

10

1.1

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Q Am I correct that you also considered as ascertainment meetings of organizations with which you were affiliated?

A Sure because it was -- the same thing is true. I mean, I didn't go -- if you, if you sit on boards there is a cross-section of people on boards and so here again the opportunity is dual. It is the business of the board if you go -- to a family and children and it's an agency service and you're having the head -- the person who is dealing with the problems of the elderly there. I mean that's invaluable information from the perspective of an organization that is a care giving organization or community based, and if you notice most of the organizations to which I belong are community based. And so the information you get there is information and the contacts you get there or some breaking issues I would give to the -- I would talk it over with Emily or Arnie, but I would also give to the news desk and -- because they would be things that would be of interest to the community, so that aspect --

Q Did you write --

MR. HOWARD: Let her answer your questions

	65
1	please, counsel.
2	WITNESS: That, that is ascertainment. Also,
3	if I am there I will be talking to somebody who is
4	sitting next to me who may be in the State Attorney's
5	Office where they are really doing something on the
6	battered women syndrome and some pieces and I get
7	information there, so it's a dual opportunity to keep
8	pulse you know, keep your finger on the pulse of the
9	community and that was my job, public affairs and
10	editorial, and so that's why it's the contacts and the
11	knowing of the people and being able to continue to

gain information that is important.

BY MS. SCHMELTZER: 13

- Now, Ms. Covington, when you went to a meeting of the Fuel Fund you put on your calendar Fuel Fund meeting, 10:00 a.m.? Correct?
- 17 Α Um-hum.

12

14

15

16

18

19

20

- Okay. Did you put down on your calendar that you sat next to Tom Jones from some organization for the elderly?
- 21 Well, I did my calendar for upcoming meetings A 22 so I wouldn't know whether or not I'd sit next to Tom Jones until I got there. 23
- When you sat next to Tom Jones and you talked 24 about the problems of the elderly or next to somebody 25

FREE STATE REPORTING, INC. Depositions Court Reporting D.C. Area (301) 261-1902 Balt. & Annap. (410) 974-0947

else who talked about the sick did you make any memos of that?

3

5

6

7

8

9

10

11

12

13

14

15

16

17

18

22

23

24

25

Α If it were something that I assumed was worthwhile and something we could lead on I would take the information to the news desk and talk it over with Bob Andbinder (phonetic sp.). I would also talk with those people and discuss angles of how they could get the story and I would kind of often be the broker, and I would also talk to Emily, Arnie and many of these things would then come up in advance, I mean, if I'd been there, as potential editorial topics that then we could go into further exploration because once we determined the topic it was my job to do all the, you know, the contacts and the follow-up and talk to people directly, you know, who were involved. So I shared the information. If you're asking me did I share the information, yes, I did.

- Q You shared it orally? Is that correct?
- A Orally but I would get phone numbers and notes and names if that were appropriate --
- 21 Q But you didn't write --

A -- but I didn't write it, I didn't -occasionally I would write something, but I didn't
unless Bob Andbinder at the news desk would ask me but
I would give him enough information and then -- and the

program people, the determination then of how they 2 formatted and used the material depending on where it It would be whose follow-up responsibility it would be. If it became an editorial or some action then the follow-up would be mine. If it were news it 6 would be news. If it were a producer of a specific program it would be that program or how Emily or Arnie 8 might even want to dispense that information. 9 Let me turn you to the entry for June 3rd. 10 It says 11:00 a.m. Rebecca Warren, Mfume, Cardin on 11 Humanitarian Dinner. Do you see that? 12 Α Uh-huh. 13 Was the purpose of that meeting to do a script for the dinner? 14 15 Α Uh-huh. 16 For the Humanitarian Dinner? 17 Uh-huh. It was the Humanitarian Dinner as 18 one of the fundraising events in the Fuel Fund of 19 Central Maryland and --20 That's an organization that you're affiliated 0 21 with? 22 And with which the station is a corporate 23 sponsor of the Fuel Fund of Central Maryland, so actually I was designated by Arnie to be the station's 24 25 representative to the Fuel Fund of Central Maryland

1 | because it was a station sponsored, you know,

2 organization. It's a very unusual arrangement with

- 3 corporate sponsors.
- 4 Q That started under Gillette? Correct?
- 5 A No. That started -- the Fuel Fund started 6 under Abel.
- 7 Q The predecessor to Gillette?
- 8 A Um-hum, A. S. Abel Company, the owners of The
- 9 Sun papers. The organization started then and it --
- 10 actually it was the station and I was very involved in
- 11 actually starting the organization because there was a
- 12 | Fuel Fund in Baltimore City but you don't want all
- 13 those details. But for this dinner, because we
- 14 sponsored it and then -- so I worked with Rebecca
- 15 putting the, the whole dinner and the intros and the
- 16 | scripting because it was emceed by -- I believe that
- 17 year it was by Beverly Burke who was a news anchor at
- 18 | Channel 2. And so I worked with Rebecca who was with
- 19 the Fuel Fund and a hearing officer for the State and
- 20 so that was -- put all that together for that, for that
- 21 dinner.
- Q Were you ever asked what programming the
- 23 station aired in response to that? In your -- strike
- 24 that. Let me ask you this. Did that Humanitarian
- 25 Dinner deal with any community issues?

A The people who were picked for that dinner by
a committee yes, basically the Fuel Fund deals with
an issue. The Fuel Fund deals with the poor. It deals
with the issue of having enough heat and trying to help
people who don't have enough money to have both fuel
and food on the table, to try to extend their financial
resources so that children don't freeze, so that that
this raises money so that the Fuel Fund can
discharge through Central Maryland the responsibility
of helping people, poor people, and the idea of social
issues and also with unemployment issues because the
Fuel Fund is one of the few places that people who lose
a job may be able to get help where you couldn't get it
from government, so it was to raise money. The dinner
was to raise money. And it is also focusing to of
Maryland legislators who are considered outstanding.
Q And what was the community need that

Q And what was the community need that -- excuse me. What was the programming, if you know, that was aired in response to that?

A Well, we aired -- I'm not sure if the News

Department aired -- periodically with things you would

do profiles and ongoing when there were problems with

funding, lacking funding, for the fuel funds across

central Maryland -- I mean energy assistance programs.

We then would do editorials on those. We would program

- 1 | the -- do a public service announcement encouraging
- 2 people to come to the dinner and support it. The News
- 3 Department covered early and I don't know whether or
- 4 not one of the public affairs shows actually
- 5 interviewed Mfume and Cardin in direct relationship,
- 6 you know, to their being honored or not.
- Q Can I have that back? I want to turn to June 6th which is the Victorian Q. Adams Humanitarian --
- 9 A Victorine.
- 10 Q Victorine Q. Adams Humanitarian Award Dinner,
- 11 recipients Kweisi Mfume and Ben Cardin, Beverly Burke
- 12 emcee, conducted by Fuel Fund Central Maryland, Janet
- 13 Covington, President. That's your entry for June 6th.
- 14 A Um-hum.
- 15 Q Does that relate to the same --
- 16 A It would be the event.
- 17 O That would be the same event?
- 18 A That would be the event in which the script
- 19 that we worked on and we did -- was then, you know,
- 20 used that night and part of the script, of course, that
- 21 night also the people there talked about the need for
- 22 the Fuel Fund and it was an opportunity to expose the
- 23 community to the Fuel Fund and hope to gain other
- 24 support of it and just people who would come to the
- 25 dinner because they were honoring Ben or Kweisi.

1	Q So was what issue arose out of that
2	particular event? What community issue, if any, arose
3	out of that particular event?
4	A Didn't I just answer that with the
5	previous
6	Q Was it the same?
7	A question?
8	Q Same issue?
9	A Yeah, yeah.
10	Q Okay.
11	A Sometimes you you know, things take more
12	than 20 minutes. You understand that?
13	Q Right. And what and the coverage of the
14	issue, was that the same?
15	A There was pre-coverage and there was event
16	coverage. I mean, there was pre
17	Q What was the programming that was aired in
18	response to that event?
19	A I don't remember specifically because I did
20	not put on the air programs.
21	Q Do you ever remember Emily Barr talking with
22	you about this event and what issue came up and what
23	programming was aired in response?
24	A Ongoing programming, whether it is in news or
25	something in relationship to those issues is on the

- l | station.
- 3 Ms. Covington, did that mean there were no entries in
- 4 your calendar?
- 5 A It may have been some of that period was
- 6 vacation time, too.
- 7 O I see.
- 8 A You know, it was during the summer and I have
- 9 a cousin at the ocean and I sometimes take extra long
- 10 weekends. As you know, the summer isn't the busiest
- 11 broadcast time of the year.
- 12 Q Did Ms. Barr ever show you her calendar
- 13 during the summer of 1992?
- 14 A No.
- 15 Q Did she ever discuss with you meetings that
- 16 she might have held to determine whether you were
- 17 present?
- 18 A In the summer of '92?
- 19 Q Right.
- 20 A I wouldn't be present at meetings in the
- 21 summer of '92.
- Q No. Did she discuss with you meetings that
- 23 she had attended in the summer of 1991 --
- 24 A Oh, okay.
- 25 Q -- to determine whether you would have been